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Ex Parte

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: *In the Matters of Regulation of Prepaid Calling Card Services*, WC Docket No. 05-68
and *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92

Dear Ms. Dortch:

On September 30, 2005, Amy L. Alvarez, Penn L. Pfautz and I of AT&T Corp. ("AT&T") had an *ex parte* meeting by telephone with Steve Morris of the FCC. In the meeting, we explained why AT&T in its September 21, 2005 *ex parte*¹ opposed Verizon's additional suggestion that carriers should be prohibited from populating a prepaid card platform number in the Charge Number (CN) parameter of the SS7 field.²

We made the following points.

Although as AT&T acknowledged in its certification proposal³ the Commission may require that all prepaid card calls be jurisdictionalized based on the location of the end-user

¹ September 21, 2005 *ex parte* Letter from Judy Sello, AT&T to Marlene H. Dortch, FCC, WC Docket No. 05-68 & CC Docket No. 01-92.

² September 9, 2005 *ex parte* Letter from Donna Epps, Verizon to Marlene H. Dortch, FCC, WC Docket No. 05-68 & CC Docket No. 01-92.

³ In its July 15, 2005 *ex parte* in support of AT&T's Emergency Petition for Immediate Interim Relief filed May 3, 2005 ("Petition") in WC Docket 05-68, AT&T proposed a set of procedures for prepaid card providers to certify compliance with interim rules relating to USF and access charge treatment of prepaid calling card services. AT&T's proposed certification process is to require *all* prepaid card providers, regardless of the regulatory classification of their services, to pay access based on the location of the end-user calling and called parties (if the Commission does not accept AT&T's preferred solution that all prepaid cards calls pay interstate access only). July 15, 2005 *ex parte* Letter from Judy Sello, AT&T to Marlene H. Dortch, FCC, WC Docket No. 05-68.

calling and called parties, prepaid card services are often (as in AT&T's case) implemented as two calls, a toll-free call to the platform and an outbound call from the platform. The platform is connected on both ends over a User-Network Interface (*e.g.*, PRI or DTMF trunking) as though it were a PBX. On the outbound side of the platform, therefore, the CN is populated based on a number provisioned on the trunk group from the platform as with any other direct-connect outbound long distance customer.

For these types of calls, CN is and needs to be platform-associated for the terminating transport provider to bill the platform customer for the outbound call. The CN may not be a geographically-significant North American Numbering Plan (NANP) number or even a NANP number at all. It would not reflect the prepaid card user's calling location (as the calling party number (CPN) generally would).

Because the CN on calls from the platform (and other nodal outbound calls) may not be meaningful to the terminating LEC and because AT&T's control on sending CN on switched access is all-or-none on a terminating trunk group basis, AT&T does not send CN to the terminating LEC from its long distance network.

Even apart from prepaid card calls there are other circumstances where CN would not reflect calling party location, *e.g.*, a single CN assigned to multiple locations so that a multi-location customer (such as a business with many locations or an individual with more than one residence) can receive a consolidated bill.⁴

For these reasons, although CPN will generally reflect calling party location on a prepaid card call, CN will not and is best not passed to the terminating carrier.

AT&T does not manipulate the CN on prepaid card calls, but the fundamental call model prevents AT&T from passing a CN that reflects the location of the prepaid card caller.

Because CN was not intended for intercarrier billing (*see* AT&T's September 21 *ex parte* at 2) -- and passing it from the IXC to the terminating carrier is optional -- Verizon's decision to rely on CN is at its own risk.

Thus, the Commission should *not* adopt Verizon's proposal to prohibit prepaid card providers from populating platform number in any "SS7 signaling parameter that would likely cause the terminating LEC to bill access charges based on the jurisdiction of the platform rather than [the location of] the end user" (Verizon at 3), because it could force many carriers to engage in costly network configurations (affecting all traffic carried on

⁴ In other words, while CPN and CN will be identical for a single-line residential or business customer, in the case of a multi-location residential or business customer, a single CN may be used for calls originating at different geographic locations, thus rendering it inaccurate for determining the location of the calling party. This is not to suggest, however, that CPN always accurately depicts the caller's location, as it does not, for example, when a wireless caller is roaming. However, the use of prepaid cards over wireless phones is limited, given that prepaid cards tend to be an alternative to a mobile phone (or perhaps even a landline phone) for many individuals.

their networks -- not just PPC traffic) for the sole purpose of avoiding an inadvertent violation of the certification requirement.

These costly reconfigurations would have no offsetting benefits in terms of enhanced enforcement of the intent of the certification requirement. Accordingly, the Commission should proceed with AT&T's proposal in its current form which prohibits insertion of platform number in the CPN field and features other protections to allow correct access billing as detailed in AT&T's July 15, 2005 and September 21, 2005 *ex partes*.

One electronic copy of this Notice is being submitted in accordance with the Commission's rules.

Sincerely,

/s/

Judy Sello

cc: Tamara Preiss
Steve Morris